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Transmittal

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Date: April 23, 2012

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Project Number: 0106270030, Phase 7A

Project Name: Former Pechiney Cast Plate Facility (3200 Fruitland Avenue)

Item Description

1 Hazardous Materials Transportation Plan (Revised April 12, 2012)

Remarks

Please find enclosed a revised copy of the Hazardous Materials Transportation Plan. Revision to the Hazardous Materials Transportation Plan was made based on U.S. EPA's conditional approval of the PCB Cleanup Level in the letter dated July 1, 2011 from 5.3 milligrams per kilogram (mg/kg) to 3.5 mg/kg. The waste disposal facility Western Environmental has also been removed from the proposed list of facilities to receive TSCA Wastes with PCB Concentrations less than 50 mg/kg as this disposal facility is currently closed.

If you have any questions, please call us at (949) 642-0245.

Sincerely yours, **AMEC**

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HAZARDOUS MATERIALS TRANSPORTION PLAN POLYCHLORINATED BIPHENYLS SOIL AND CONCRETE

Former Pechiney Cast Plate, Inc. Facility
Vernon, California

Prepared for:

Pechiney Cast Plate, Inc.

Prepared by:

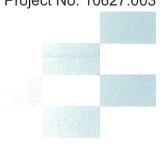
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121 Innovation Drive, Suite 200 Irvine, California 92617 (949) 642-0245

November 4, 2010 (Revised April 12, 2012)

Project No. 10627.003





Hazardous Materials Transportation Plan

1.0 INTRODUCTION

At the request of the United States Environmental Protection Agency (U.S. EPA), AMEC Environment & Infrastructure, Inc. (AMEC; formerly AMEC Geomatrix, Inc.) has prepared this Hazardous Materials Transportation Plan (HMTP) on behalf of Pechiney Cast Plate, Inc. (Pechiney). Soil and concrete debris will be generated during the performance of below grade demolition of slabs and structures and remedial soil removal activities at the former Pechiney site (Site), located at 3200 Fruitland Street in Vernon, California.

This HMTP is a component of the Remedial Action Work Plan (RAP) that addresses site remediation, including the removal of soil and concrete impacted with polychlorinated biphenyls (PCBs). The site-wide remedial actions proposed in the RAP will be overseen by the Department of Toxic Substances Control (DTSC). Removal and landfill disposal of PCB-impacted soil and concrete is additionally described in the PCB Notification Plan (Application). PCB-related actions will be overseen by U.S. EPA, and the associated hauling route for transportation and disposal of PCB-impacted material is described in this HMTP.

All removal, transportation, and disposal activities will be performed in accordance with applicable federal, state, local laws, regulations, and ordinances. While this HMTP does not discuss other waste streams that will be generated during implementation of the RAP, all off-site disposal hauling vehicles must comply with the transportation route presented herein.

2.0 WASTE CHARACTERIZATION

Characterization sampling results from previous investigations in the areas of the proposed remedial activities indicate that PCBs are present in some areas of the Site in soil and concrete at concentrations that exceed either risk-based cleanup levels, or Toxic Substances Control Act (TSCA) waste thresholds. Soil and concrete debris impacted with PCBs will be generated during below grade demolition and remediation activities. Debris that contains concentrations of PCBs greater than 1 milligram per kilogram (mg/kg) would be considered bulk PCB-containing wastes or PCB remediation wastes. The as-found (in-situ) PCB concentrations in soil and concrete will be used to determine the offsite disposal method and disposal facility, as specified in 40 Code of Federal Regulations (CFR) 761.61(a)(5). Soil and concrete with PCB concentrations greater than 1 mg/kg are regulated for disposal under TSCA as a bulk PCB remediation waste. Soil and concrete with PCB concentrations greater than 50 mg/kg are also regulated under TSCA as hazardous waste and will be disposed of in a TSCA-permitted chemical waste disposal facility.

3.0 REQUIREMENTS OF TRANSPORTERS

All waste transporters shall be fully licensed and insured to transport the materials. For transportation of hazardous wastes, the selected transporter(s) shall be a registered hazardous waste hauler.

4.0 TRAFFIC CONTROL PROCEDURES

Wastes for off-site disposal will be transported in covered hauling trucks to the designated disposal facility. Prior to loading, all trucks will be staged on-site to minimize impacts to the local streets.

Traffic will be coordinated in such a manner as to minimize impacts to surrounding surface streets and reduce dust generation during on-site transportation. While at the Site, all vehicles will be required to comply with a five miles per hour construction equipment speed limit, for safety purposes and for dust control measures.

Specific requirements for truck staging, loading procedures, traffic control and acceptable hours of operation for off-site waste shipments are provided in the RAP.

5.0 TRANSPORTATION ROUTES

Hauling vehicles that will transport PCB-impacted soil and concrete from Pechiney to the designated disposal facility will use arterial streets and freeways upon exiting the Site. Hauling vehicles that may transport other non-PCB waste streams that may also require off-site disposal will also be required to follow the transportation route identified in this HMTP.

The arterial streets from the Site to the nearest freeway are approved for commercial truck traffic and pass through non-residential (industrial and commercially-zoned) areas entirely within the City of Vernon. The proposed transportation route will not impact surrounding communities such as Huntington Park, Maywood, or Bell.

The transport trucks will enter the Site from Fruitland Avenue, located on the north side of the property. Loaded waste hauling trucks will exit the Site onto Fruitland Avenue then turn left (west) proceeding one block to Boyle Avenue. At Boyle Avenue, trucks will turn right (north) proceeding to Leonis Boulevard. Trucks will then turn right (east) on Leonis Boulevard (Leonis turns into District Avenue) and proceed to Atlantic Boulevard. At Atlantic Boulevard, trucks will then turn left (north) and proceed until they reach the Interstate 710 freeway.

Interstate 710 then intersects with other southern California freeways to enable transit to the proposed disposal facilities outside of the Los Angeles area. There are numerous alternate freeway routes that can be taken to the designated facilities, depending on daily traffic conditions. Figure 1 delineates the truck route from the Site to the Interstate 710 freeway. The approximate distance from the Site to Interstate 710 along the proposed transportation route is 2.25 miles.

6.0 OFF-SITE DISPOSAL FACILITIES

Based on the results of waste profile and classification, PCB-impacted soil and concrete debris will be transported to an appropriate off-site disposal facility.

6.1 TSCA Hazardous Wastes with PCB Concentrations Greater than 50 mg/kg

Bulk PCB remediation wastes with as-found concentrations greater than 50 mg/kg are proposed to be disposed of at the Class I Hazardous Waste TSCA disposal facility specified below.

US Ecology, Inc. Highway 95 (11 miles south of Beatty) Beatty, Nevada 89003 (800) 239-3943

Final determination of the specific landfill selected for disposal will be based on actual waste profiles and approval from the proposed landfill.

6.2 TSCA Wastes with PCB Concentrations Less than 50 mg/kg

Bulk PCB remediation wastes with as-found concentrations greater than 3.5 mg/kg but less than 50 mg/kg are proposed to be disposed of at the Class III Landfill as specified below, based on waste constituent and concentration:

Chiquita Canyon Landfill 29201 Henry Mayo Drive Castaic, California 91384 (661) 257-3655

Final determination of the specific landfill selected for disposal will be based on actual waste profiles and approval from the proposed landfill.

7.0 CONTINGENCY PLAN

Each waste hauler will be required to have a contingency plan prepared for emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of wastes from the Site to the disposal facility.

8.0 RECORDKEEPING

Once the disposal facility is determined, copies of waste profiles used to secure disposal permission from the facility will be provided to DTSC and U.S. EPA. AMEC will be responsible for maintaining a disposal log during the removal action activities. The disposal log will document the date and time of waste shipments, hauling truck number, type of waste hauled, waste destination, along with other project information. Copies of completed manifests for all disposal loads will be provided to DTSC and U.S. EPA and included in a final report.

